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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

GERARDO ACEVES, THOMAS FAN,
EDWIN MARTINEZ, TIFFANY SMOOT,
EDOUARD CORDI, and BRETT
MAGGARD, Individually, and On Behalf of
All Others Similarly Situated,

Plaintiffs,

v.

COINBASE GLOBAL, INC., COINBASE,
INC., and BRIAN ARMSTRONG,

Defendants.

Case No. 3:24-cv-02663-MMC

(Consolidated with Case No. 3:24-cv-03350)

**STIPULATION AND ~~PROPOSED~~
ORDER SETTING DEADLINES FOR
MOTION TO TRANSFER BRIEFING**

Pursuant to Rules 6-2 and 7-12 of the Northern District of California Civil Local Rules (“Civil Local Rules”), plaintiffs in *Aceves v. Coinbase Global, Inc., et al.*, No. 3:24-cv-02663-MMC (the “*Aceves* Action”), Gerardo Aceves, Thomas Fan, Edwin Martinez, Tiffany Smoot, Edouard Cordi, and Brett Maggard, individually and on behalf of all others similarly situated, along with plaintiffs in *Carter v. Coinbase Global, Inc., et al.*, No. 3:24-cv-03350-CRB (the “*Carter* Action”, and together with the *Aceves* Action, the “Action”), Mollijoy Carter, Bradley Barnes, and Antonett Foy, individually and on behalf of all others similarly situated, and Defendants Coinbase Global, Inc., Coinbase, Inc., and Brian Armstrong (“Defendants”, and Defendants together with Plaintiffs, the “Parties”), hereby agree and stipulate subject to the terms below that good cause exists to request an order from the Court regarding Defendants’ motion to transfer and all related deadlines.

A. On July 30, 2024, the Parties filed an administrative motion setting forth a briefing schedule related to consolidation of the Actions and Defendants’ anticipated motion to transfer. *See* ECF No. 18. Pursuant to that stipulation, Plaintiffs agreed to file a consolidated complaint within thirty (30) days of the Court’s order on Plaintiffs’ motion to consolidate. *Id.* Defendants agreed to file their anticipated motion to transfer within thirty (30) days of the filing of the consolidated complaint. *Id.* Plaintiffs agreed to file any opposition to this motion within thirty (30) days, and Defendants agreed to file any reply within fifteen (15) days. *Id.*

B. The Court granted this motion on July 31, 2024 (the “July 31 Scheduling Order”). *See* ECF No. 21.

C. Consistent with the deadlines set forth in the July 31 Scheduling Order, on October 16, 2024, Defendants filed a motion to transfer the Action to the Southern District of New York (“Motion to Transfer”). *See* ECF No. 31.

D. On October 17, 2024, the Clerk of the Court set briefing deadlines in accordance with the default rules established by Civil Local Rule 7-3, rather than in accordance with the Court’s July 31 Scheduling Order.

1 E. On October 21, 2024, counsel for the Parties jointly contacted the Court's chambers
2 regarding the situation and were advised to file this stipulation to adjust the schedule to be consistent
3 with the July 31 Scheduling Order.

4 NOW, THEREFORE, the Parties, subject to approval of the Court, hereby stipulate and agree
5 as follows:

- 6 1. Plaintiffs shall file any opposition to Defendants' Motion to Transfer on November
7 15, 2024.
- 8 2. Defendants shall file any reply on December 3, 2024.
- 9 3. The hearing on the Motion to Transfer shall be set for January 17, 2025.
- 10 4. The Parties expressly preserve all other rights and defenses.

11 IT IS SO STIPULATED.

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1 Dated: October 22, 2024

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*Admission pro hac vice application
forthcoming

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Attestation Pursuant to Local Rule 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories.

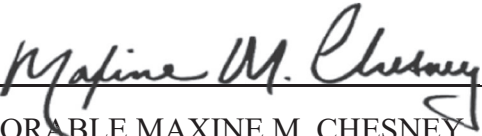
DATED: October 22, 2024

By: /s/ Mark R. S. Foster
Mark R.S. Foster

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: October 22, 2024



HONORABLE MAXINE M. CHESNEY
UNITED STATES DISTRICT JUDGE